

RUSH MOORE LLP
A Limited Liability Law Partnership

J. STEPHEN STREET 1573-0
REGINAULD T. HARRIS 7516-0
Pacific Guardian Center, Mauka Tower
737 Bishop Street, Suite 2400
Honolulu, Hawaii 96813
Ph: (808) 521-0400
FAX: (808) 521-0597
e-mail: jstreet@rmhawaii.com
rharris@rmhawaii.com

FILED IN THE
UNITED STATES DISTRICT COURT
DISTRICT OF HAWAII

FEB 03 2006
at 6 o'clock and 09 min
SUE BEITIA, CLERK

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

PACIFIC STOCK, INC.,)	CIVIL NO. CV04-00725 JMS/LEK
)	(Copyright Infringement)
Plaintiff,)	
)	SUPPLEMENTAL DECLARATION
vs.)	OF J. STEPHEN STREET IN
)	SUPPORT OF PLAINTIFF PACIFIC
SOLTUR, INC., a Hawaii)	STOCK, INC.'S MOTION FOR
corporation; GIGI FIORENTINO,)	SANCTIONS AGAINST
individually; LUIS ZANOTTA,)	DEFENDANTS SOLTUR, INC.;
individually,)	GIGI FIORENTINO, Individually;
)	AND LUIS ZANOTTA, Individually
Defendants.)	FOR FAILURE TO RESPOND TO
)	DISCOVERY, FILED FEBRUARY 2,
)	2006; CERTIFICATE OF SERVICE
)	
)	<u>Hearing:</u>
)	Date: Tuesday, March 7, 2006
)	Time: 9:30 a.m.
)	Judge: Hon. Leslie E. Kobayashi

ORIGINAL

)
)
) Final Pre-Trial Conference:
) Original Date: February 9, 2006
) NEW DATE: February 8, 2006
) Time: 10:30 a.m.
) Judge: Hon. J. Michael Seabright
)
) TRIAL:
) Date: February 14, 2006
) Time: 9:00 a.m.
) Judge: Hon. J. Michael Seabright
)
)
)
_____)

**SUPPLEMENTAL DECLARATION OF J. STEPHEN STREET
IN SUPPORT OF PLAINTIFF PACIFIC STOCK, INC.'S MOTION FOR
SANCTIONS AGAINST DEFENDANTS SOLTUR, INC.; GIGI
FIORENTINO, Individually; AND LUIS ZANOTTA, Individually, FOR
FAILURE TO RESPOND TO DISCOVERY, FILED FEBRUARY 2, 2006**

I, J. Stephen Street, do hereby declare and state under penalty of
perjury as follows:

1. I am an attorney licensed to practice law in the State of Hawaii.
2. I am an attorney with the law firm of Rush Moore LLP, A
Limited Liability Law Partnership, and am counsel for Plaintiff PACIFIC STOCK,
INC. ("Plaintiff") in this matter.

3. I have personal knowledge of and am competent to testify to the matters contained in this Declaration in support of Plaintiff's Motion for Sanctions Against Defendants SOLTUR, INC., GIGI FIORENTINO, Individually; and LUIS ZANOTTA, Individually, for failure to respond to discovery, which was filed with the Court on February 2, 2006 ("Motion for Sanctions").

4. Later that same day, February 2, 2006, I obtained a new telephone number for Sidney Quintal, Esq. (291-8394), and I left a message for him.

5. At approximately 4:50 p.m., Mr. Quintal returned my telephone call.

6. I advised Mr. Quintal that pursuant to the Local Rules of Practice for the United States District Court for the District of Hawaii, I was attempting to meet and confer with him concerning the outstanding discovery requests. I asked him whether his clients intend to comply with the outstanding discovery requests. He advised me that he would have to talk to his clients but that he was unable to respond either way at the present time. I requested that he confer with his clients and contact me as soon as possible.

I declare under penalty of law that the foregoing is true and correct to the best of my knowledge.

DATED: Honolulu, Hawaii, February 3, 2006.



J. STEPHEN STREET

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

PACIFIC STOCK, INC.,)	CIVIL NO. CV04-00725 JMS/LEK
)	(Copyright Infringement)
Plaintiff,)	
)	CERTIFICATE OF SERVICE
vs.)	
)	
SOLTUR, INC., a Hawaii)	
corporation; GIGI FIORENTINO,)	
individually; LUIS ZANOTTA,)	
individually,)	
)	
Defendants.)	
)	
_____)	

CERTIFICATE OF SERVICE

The undersigned certifies that a copy of the foregoing document will be duly served upon the following party by U.S. Mail, addressed to him at his last known addresses, on February 3, 2006:

SIDNEY M. QUINTAL, ESQ.
1188 Bishop Street, Suite #3301
Honolulu, Hawaii 96813
Attorney for Defendants SOLTUR, INC.
GIGI FIORENTINO, and LUIS ZANOTTA

SIDNEY M. QUINTAL, ESQ.
1188 Bishop Street, Suite #3402
Honolulu, Hawaii 96813
Attorney for Defendants SOLTUR, INC.
GIGI FIORENTINO, and LUIS ZANOTTA

DATED: Honolulu, Hawaii, February 3, 2006.



J. STEPHEN STREET
Attorney for Plaintiff
PACIFIC STOCK, INC.